

**Updated Exhibit D for Motion for TRO
and Preliminary Injunction
Plaintiff's Updated Redacted Declaration
April 19, 2025**

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Student DOE #1

Plaintiff,

v.

Donald J. TRUMP, in his official
capacity, President of the United
States of America;

John TSOUKARIS, in his official capacity
as ICE Enforcement and Removal
Operations New Jersey Field Office
Director;

Todd M. LYONS, in his official capacity,
Acting Director, Immigration and
Customs Enforcement, U.S. Department
of Homeland Security; and

Kristi NOEM, in her official capacity,
Secretary, U.S. Department of Homeland
Security;

Defendants.

Case No.

DECLARATION OF XXXX XXXX

STUDENT DOE #1

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1. My name is XXXX XXXX.
 2. I am over eighteen years of age and am competent to testify regarding the matters described below.
 3. I am a citizen of XXXX, I currently live in Jersey City, New Jersey.

Declaration of Plaintiff

4. I graduated with a Masters in Mathematical Statistics and Probability from XXXXXXXXXXXX University, and graduated in December 2022.
5. After graduation, I obtained my Optional Practical Training work authorization pursuant to my F-1 visa and studies and began working for XXXXXXXXXXXX in January 2023. I have been continuously employed by the same employer since that date.
6. I am currently living with my partner, a lawful permanent resident of the United States.
7. On July 12, 2024, I was involved in a dispute with my ex-boyfriend and was charged with a single municipal disorderly persons offense in the XXXXXXXXXXXX Municipal Court for simple assault in violation of Disorderly Persons Code 2C:12-1A(1). I plead not guilty and on September 24, 2024, the city attorney dismissed the case. I have no other criminal history.
8. On April 10, 2025 at 9:06 AM, I received an email from the International Student and Scholars Office at XXXXXXXXXXXX University. The email stated that “We noticed that your SEVIS record was auto-terminated on 4/9/2025 by SEVP with the reason below and we wanted to make sure you were aware of it. The email indicated that my SEVIS record had been auto-terminated on April 9, 2025 by SEVP with the reason, “Termination Reason: OTHER – Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated.” The letter gave me a list of legal resources to whom I could reach out.
9. I also found out that on April 9, 2025, the Department of State revoked my visa, so if I leave, I fear I won’t be able to return.
10. My employer, upon finding out that my SEVIS had been terminated, terminated my employment, and has halted my immigration processes.

11. My work authorization expires on January 15, 2026, and before I was laid off, I had plans of entering the H-1B lottery and changing my status in the United States.

12. However, now my employer is unwilling to continue with my case. Given the unexpected nature of my current circumstances, I am unable to change status to another valid nonimmigrant status, unable to change employers, unable to apply for enrollment at a different school or doctorate program and unable to pursue other post-graduate opportunities.

13. Before I was laid off, I was earning \$102,000 a year as a Risk and Reporting Analyst and my prospects for continued employment and growth were good.

14. The loss of my employment has significantly affected my career trajectory, my mental health, and my earning potential.

15. Over the past week, since finding out about my SEVIS termination and losing my job, I have suffered from extreme stress and anxiety that I may lose everything that I have worked so hard to obtain over the past 4 years of graduate study and OPT. I am frightened to be separated from my lawful permanent resident partner and terrified that I will be arrested, transferred and deported like so many other students I am hearing about on the news.

16. I live every day in fear and will not rest until this is resolved.

I declare under penalty of perjury that the foregoing is true and correct. (U.S. Code, Title 28 U.S.C. section 1746).

Dated, April 17, 2025

/s/ XXXX XXXX

XXXX XXXX